

# RHC vs. FQHC

## Medicare Certification Requirements

### RHC

- Be located in non-urban area,
- Meet HRSA determination of shortage area by HPSA or MUA,
- Meet State Licensure requirements,
- Pass State Survey to verify Conditions of Participation (COPs).

### FQHC

- Be entitled or be eligible to receive Grant under section 330 of Public Health Service Act as determined by HRSA (includes rural assessment),
- Meet HRSA determination of shortage area by HPSA, MUA, or MUP;
- Meet State Licensure,
- Attest to meeting COPs.

# LOCATION OF CLINIC Determines Rural Designation

- Each clinic location must be in a rural area as defined by the Census Bureau;
- The 2000 Census changed several areas in California to an urbanized area.
- CMS Regional Office will make rural location determination, and,
- HRSA continues to determine HPSA, MUA and MUP.

# **CMS DETERMINATION OF RURAL DESIGNATION for RHC Certification**

- **CMS adopts the U.S. Census Bureau definition of “urbanized” to be a central city of 50,000 or more and its adjacent suburbs.**
- **Any area not defined as urbanized is considered “rural.”**
- **Census Mapping tool:**  
**[www.raconline.org/infoguides/clinics/rhcfaq.php](http://www.raconline.org/infoguides/clinics/rhcfaq.php)**

# RHC vs. FQHC

## Medicare Application Process

### RHC

- Submit Form CMS-29 through California Central Licensing Unit. Call 916-552-8632 for details. Separately, contact Fiscal Intermediary for Medicare application by calling Riverbend at 877-296-6189.
- State Agency will coordinate CMS-29 for determination of rural designation and HRSA's determination of shortage area by HPSA or MUA.
- If all above are approved, then the State Agency will conduct survey. State Agency will forward package to CMS for clearance.

### FQHC

- Contact HRSA to apply for Grant determination.
- Contact State Agency to obtain licensure application.
- Contact special Medicare FI (UGS-Wisconsin) for Medicare application package (Telephone: 877-309-4290).
- Return application materials to FI and FI will forward package to CMS for clearance.

Important note: *Each* FQHC location must have a separate Medicare certification number, even if they are related.

# **CMS & HRSA RESOURCES -- Websites**

- ❑ Starting a Rural Health Clinic (RHC) - "A How-to Manual" Go to:  
<ftp://ftp.hrsa.gov/ruralhealth/RHCmanual1.pdf>
- ❑ California Central Applications process: Call 916-552-8632 for Medicare Rural Determination Form CMS-29 and instructions on where to send application. Form is also found at  
<http://dhs.ca.gov/publications/forms/L&C/index.htm>
- ❑ RHC Medicare & Survey Information (Conditions of Participation):  
<http://www.cms.hhs.gov/providers/rh/> and  
[http://www.cms.hhs.gov/manuals/107\\_som/som107ap\\_g\\_rhc.pdf](http://www.cms.hhs.gov/manuals/107_som/som107ap_g_rhc.pdf)
- ❑ FQHC Medicare info: <http://www.cms.hhs.gov/providers/fqhc/>
- ❑ Medicare Modernization Act - Enhancements to healthcare delivery and coverage:  
[http://www.uwex.edu/ces/flp/health/medicare\\_act.ppt](http://www.uwex.edu/ces/flp/health/medicare_act.ppt)
- ❑ Provider Based Determinations -  
[www.cms.hhs.gov/manuals/pm\\_trans/A03030.pdf](http://www.cms.hhs.gov/manuals/pm_trans/A03030.pdf)

# CMS RESOURCES - Rural Issues for San Francisco Region

- ❑ Denise McCague, CMS-San Francisco Regional Office,  
Regional Rural Coordinator, Phone: 415-744-4909  
email: dmccague@cms.hhs.gov
- ❑ Ron Ho, CMS-San Francisco Regional Office  
Certification policy, Phone: 415-744-2835  
e-mail: rho@cms.hhs.gov
- ❑ Deborah Romero, CMS-San Francisco Regional Office  
Nurse Consultant, Clinical and Survey policy questions,  
Phone: 415-744-3706, email: dromero@cms.hhs.gov
- ❑ Health Resources and Services Administration (HRSA) Contact for  
Grant application, HPSA/MUA information, and new QA  
improvement Program. For personal assistance, call Apryl Clark,  
HRSA Liaison, 301-594-3730 or email: apryl.clark@hrsa.hhs.gov  
<http://ruralhealth.hrsa.gov/links/> (Grant Info)  
<http://ruralhealth.hrsa.gov/policy/RHCQAPI.htm> (QAPI Info)